

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

PAUL MARAVELIAS,	)	Civil No. 1:19-CV-00487(JL)
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	
	)	
JUSTICES OF THE SUPREME COURT OF NEW	)	
HAMPSHIRE, et al.	)	
	)	
<i>Defendants.</i>	)	
	)	

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**PLAINTIFF’S OPPOSITION TO THE ATTORNEY GENERAL’S  
MOTION TO DISMISS**

NOW COMES Paul Maravelias (“Plaintiff”) and Objects to the Attorney General’s 3/6/20 Motion to Dismiss and Memorandum in Support (ECF Docs #19, #19-1).

The Attorney General is a proper party to this suit. Further, even if the Attorney General were to be dismissed, Plaintiff’s second amended complaint (“Complaint”) contains sufficient factual allegations and legal claims which could plausibly result in declaratory relief that N.H. Sup. Ct. R. 23 (“Rule 23”) is facially unconstitutional. Under the applicable standard of review for a Rule 12(d)(6) Motion to Dismiss, dismissal at this stage is therefore unwarranted. Plaintiff hereby repeats and incorporates by reference his contemporaneously filed Memorandum of Law in Support of Plaintiff’s Opposition to Attorney General’s Motion to Dismiss.

WHEREFORE, Plaintiff Paul Maravelias respectfully requests this Honorable Court:

- A. Deny the Attorney General's 3/6/20 Motion to Dismiss Second-Amended Complaint; and
- B. Grant any further relief as may be deemed just and proper.

Dated: March 29<sup>th</sup>, 2020

Respectfully submitted,  
PAUL J. MARAVELIAS,  
  
*pro se*

/s/ Paul J. Maravelias  
  
**Paul J. Maravelias**  
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**CERTIFICATE OF SERVICE**

I, Paul Maravelias, certify that a timely provided copy of this document is being sent on this date to counsel of record for the Defendants pursuant to the rules of this Court by means of ECF filing.

/s/ Paul J. Maravelias  
**Paul J. Maravelias**

Dated: March 29<sup>th</sup>, 2020